

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: Edward Franklin Dabney  
Angelea Michelle Dabney**

**Debtor(s)**

**CHAPTER13**

**FREEDOM MORTGAGE CORPORATION  
Movant**

**vs.**

**NO. 20-00555 HWV**

**Edward Franklin Dabney  
Angelea Michelle Dabney**

**Debtor(s)**

**Jack N. Zaharopoulos**

**Trustee**

**11 U.S.C. Section 362**

**DEBTORS' ANSWER TO MOTION OF FREEDOM  
MORTGAGE CORPORATION FOR RELIEF FROM  
THE AUTOMATIC STAY**

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied. There were no arrears at the time the bankruptcy was filed.
6. Admitted in part; Denied in part. Debtors have failed to make some mortgage payments post-petition.
7. Denied in that Debtors are without personal knowledge as to the exact amount of arrears.
8. Denied. Debtors can cure the arrears through an amended plan.

9. No response required.

WHEREFORE, Debtors respectfully request this Honorable Court deny the Motion for Relief from Stay.

Respectfully submitted,

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